UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

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UNITED STATES OF AMERICA

 \mathbf{v}_{\bullet}

JOEL M. MEFFORD

JUDGE MANUS A DIV. COL

INDICTMENT

21 U.S.C. § 841(a)(1), (b)(1)(B)(ii) 21 U.S.C. § 841(a)(1), (b)(1)(A)(ii) 18 U.S.C. § 1957 FORFEITURE ALLEGATIONS

THE GRAND JURY CHARGES:

All dates and times in this Indictment are alleged to be "on or about," "in and around," or "through and including" the specific dates stated.

COUNT 1 (Possession With Intent to Distribute 500 Grams or More of Cocaine)

- 1. At all times relevant to this Count, Defendant **JOEL M. MEFFORD** was a police officer with the Columbus Division of Police. One of his duties was to investigate drug crimes.
- 2. On February 5, 2020, Defendant **JOEL M. MEFFORD** and the other Columbus police officer conducted surveillance on a detached garage rented by a subject of one of their narcotics investigations. They saw the subject enter the detached garage, where they believed he was engaging in drug activity.
- 3. On February 5, 2020, Defendant **JOEL M. MEFFORD** and the other Columbus police officer planned to obtain warrants to search the subject's residence and detached garage on the morning of February 6, 2020.

- 4. On February 5, 2020, an employee of the apartment complex where the subject lived provided access to Defendant **JOEL M. MEFFORD** and the other Columbus police officer to enter the detached garage.
- 5. On February 5, 2020, Defendant **JOEL M. MEFFORD** and the other Columbus police officer, without a warrant, unlawfully entered and searched the detached garage. Defendant **JOEL M. MEFFORD** found two kilograms of cocaine in the rafters of the garage. Defendant **JOEL M. MEFFORD** and the other Columbus police officer unlawfully seized and removed one of the two kilograms of cocaine from the rafters. They left the other kilogram of cocaine to be found during the execution of the search warrant the following morning.
- 6. On February 5 or 6, 2020, Defendant **JOEL M. MEFFORD** and the other Columbus police officer provided the stolen kilogram of cocaine to PERSON A to sell.
- 7. On February 6, 2020, Columbus police officers, including Defendant **JOEL M. MEFFORD** and the other Columbus police officer, executed search warrants on the subject's residence and detached garage. They discovered the remaining kilogram of cocaine in the rafters of the garage. Defendant **JOEL M. MEFFORD** was photographed holding the kilogram of cocaine.
- 8. On February 5, 2020, in the Southern District of Ohio, Defendant **JOEL M. MEFFORD** knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(ii).

COUNT 2

(Possession With Intent to Distribute 500 Grams or More of Cocaine)

- 9. At all times relevant to this Count, Defendant **JOEL M. MEFFORD** was a police officer with the Columbus Division of Police. One of his duties was to investigate drug crimes.
- 10. In February and March 2020, Defendant **JOEL M. MEFFORD** and another Columbus police officer were investigating drug-trafficking activity. They identified one house on Ambleside Drive in Columbus, Ohio, and one house on Kilbourne Avenue in Columbus, where they believed drug-trafficking activity was occurring.
- 11. On March 7, 2020, a vehicle that was significant to the investigation of Defendant **JOEL M. MEFFORD** and the other Columbus police officer stopped at a gas station. The vehicle was being driven by PERSON B.
- 12. On March 7, 2020, Defendant **JOEL M. MEFFORD** and the other Columbus police officer confronted PERSON B at the gas station. PERSON B told the officers that he worked for PERSON C and that PERSON B had just taken a kilogram of cocaine from the Ambleside house to the Kilbourne house. PERSON B also told the officers that there was more cocaine in the Ambleside house.
- 13. On March 7, 2020, Defendant **JOEL M. MEFFORD**, the other Columbus police officer, and PERSON B traveled from the gas station to the Ambleside house.
- 14. On March 7, 2020, PERSON B entered the house, where PERSON C was present.

 A bag containing multiple kilograms of cocaine was removed from the house, and Defendant

 JOEL M. MEFFORD and the other Columbus police officer took possession of the bag.
- 15. On March 7, 2020, Defendant **JOEL M. MEFFORD**, the other Columbus police officer, PERSON B, and PERSON C traveled from the Ambleside house to the Kilbourne house. At this point, PERSON C was under arrest. A kilogram of cocaine was removed from the

Kilbourne house and seized by Defendant **JOEL M. MEFFORD** and the other Columbus police officer.

- 16. On March 7, 2020, Defendant **JOEL M. MEFFORD** turned one kilogram of cocaine into evidence. Defendant **JOEL M. MEFFORD** and the other Columbus police officer stole the other kilograms of cocaine.
- 17. In March 2020, the other Columbus police officer provided the stolen kilograms of cocaine to PERSON D to sell.
- 18. On March 7, 2020, in the Southern District of Ohio, Defendant **JOEL M. MEFFORD** knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(ii).

COUNT 3

(Possession With Intent to Distribute 5 Kilograms or More of Cocaine)

- 19. At all times relevant to this Count, Defendant **JOEL M. MEFFORD** was a police officer with the Columbus Division of Police. One of his duties was to investigate drug crimes.
- 20. In 2020, Defendant **JOEL M. MEFFORD** and another Columbus police officer discussed stealing cocaine from the Columbus police property room. They planned to steal kilograms of real cocaine from the property room and replace them with kilograms of fake cocaine.
- 21. In 2020, PERSON D, at the direction of the other Columbus police officer, made kilograms of fake cocaine and provided them to the officer. The other officer placed the kilograms of fake cocaine in a black hard plastic case with foam dividers.
- 22. On March 28, 2020, Defendant **JOEL M. MEFFORD** searched for two property room clerks on Columbus police databases.

- 23. On April 2, 2020, Defendant **JOEL M. MEFFORD** searched for five property room clerks on a Columbus police database.
- 24. On April 3, 2020, Defendant **JOEL M. MEFFORD** arrived at his assigned Columbus police substation before his scheduled shift. He obtained a police cruiser and drove to the Columbus police property room.
- 25. On April 3, 2020, at 6:50 p.m., Defendant **JOEL M. MEFFORD** used his Columbus police keycard to enter a pedestrian entrance gate at the Columbus police property room.
- 26. On April 3, 2020, at 6:50 p.m., Defendant **JOEL M. MEFFORD** used his Columbus police keycard to enter the Columbus police property room's exterior entrance.
- 27. On April 3, 2020, at 6:51 p.m., the other Columbus police officer used his Columbus police keycard to enter a pedestrian entrance gate at the Columbus police property room.
- 28. On April 3, 2020, at 6:52 p.m., the other Columbus police officer used his Columbus police keycard to enter the Columbus police property room's exterior entrance.
- On April 3, 2020, Defendant **JOEL M. MEFFORD** and the other Columbus police officer entered the Columbus police property room. They were in possession of the kilograms of fake cocaine in the black hard plastic case with foam dividers. Defendant **JOEL M. MEFFORD** and the other Columbus police officer had worked on an investigation where Columbus police had previously seized a large quantity of drugs where the subjects had not been charged with crimes. Defendant **JOEL M. MEFFORD** and the other Columbus police officer told the property room clerk that they needed to examine evidence from that seizure in the back room of the Columbus police property room.

- 30. On April 3, 2020, Defendant **JOEL M. MEFFORD** and the other Columbus police officer entered the back room with the kilograms of fake cocaine in the black hard plastic case with foam dividers.
- 31. On April 3, 2020, Defendant **JOEL M. MEFFORD** and the other Columbus police officer swapped the kilograms of real cocaine with kilograms of fake cocaine in the back room of the Columbus police property room. They placed approximately 20 kilograms of real cocaine in the black hard plastic case with foam dividers and left the property room.
- 32. On April 3, 2020, Defendant **JOEL M. MEFFORD** transported the stolen kilograms of cocaine in the police cruiser.
- 33. On April 3, 2020, Defendant **JOEL M. MEFFORD** and the other Columbus police officer drove separately and met near Nationwide Children's Hospital in Columbus. Defendant **JOEL M. MEFFORD** provided the stolen kilograms of cocaine in the black hard plastic case with foam dividers to the other Columbus police officer.
- 34. On April 3, 2020, the other Columbus police officer stored the stolen kilograms of cocaine at the residence of PERSON A.
- 35. In April 2020, the other Columbus police officer provided the stolen kilograms of cocaine to PERSON D to sell.
- 36. On April 3, 2020, in the Southern District of Ohio, Defendant **JOEL M. MEFFORD** knowingly and intentionally possessed with intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(ii).

COUNT 4 (Money Laundering)

- 37. The allegations in Count 3 of this Indictment are realleged here.
- 38. On April 10, 2020, Defendant **JOEL M. MEFFORD** arrived at his assigned Columbus police substation, which was in the southwest area of Columbus.
- 39. On April 10, 2020, Defendant **JOEL M. MEFFORD** radioed that he was traveling to another Columbus police substation, which was in the northeast area of Columbus.
- 40. On April 10, 2020, Defendant **JOEL M. MEFFORD** and the other Columbus police officer met at an empty U-Haul parking lot, located off Sinclair Road in Columbus. Defendant **JOEL M. MEFFORD** drove there in a Columbus police cruiser. The other Columbus police officer provided Defendant **JOEL M. MEFFORD** with his share of the proceeds of the sale of the stolen kilograms of cocaine described in Count 3 of this Indictment. Defendant **JOEL M. MEFFORD** did not use his police keycard that night at the substation in the northeast area of Columbus.
- 41. On April 10, 2020, Defendant **JOEL M. MEFFORD** drove back to the police zone where he was assigned.
- 42. On April 28, 2020, in the Southern District of Ohio and elsewhere, Defendant **JOEL M. MEFFORD** did knowingly engage and attempt to engage in a monetary transaction by, through, and to a financial institution, affecting interstate and foreign commerce—that is, a \$72,015 cash deposit into his personal JPMorgan Chase Bank account—in criminally derived property of a value greater than \$10,000, such property having been derived from a specified unlawful activity—that is, the drug offense alleged in Count 3 of this Indictment.

In violation of 18 U.S.C. § 1957.

FORFEITURE ALLEGATION A

- 43. The allegations of Counts 1 through 3 of this Indictment are realleged here.
- 44. Upon conviction of any of the controlled substance offenses alleged in Counts 1 through 3 of this Indictment, Defendant **JOEL M. MEFFORD** shall forfeit to the United States, under 21 U.S.C. § 853(a)(1) and (2), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violation and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violation.
- 45. If, as a result of any act or omission of Defendant **JOEL M. MEFFORD**, the forfeitable property so described, or any portion thereof cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of Defendant **JOEL M. MEFFORD** up to the value of the subject property.

Forfeiture in accordance with 21 U.S.C. § 853(a)(1) and (2) and Rule 32.2 of the Federal Rules of Criminal Procedure.

FORFEITURE ALLEGATION B

- 46. The allegations of Count 4 of this Indictment are realleged here.
- 47. Upon conviction of the money laundering offense alleged in Count 4 of this Indictment, Defendant **JOEL M. MEFFORD** shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in the offense as alleged in such count, or any property traceable to such property, including but not limited to \$72,015 in the form of a forfeiture money judgment.

48. If, as a result of any act or omission of Defendant **JOEL M. MEFFORD**, the forfeitable property so described, or any portion thereof cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b)(1), to seek forfeiture of any other property of Defendant **JOEL M. MEFFORD** up to the value of the subject property.

Forfeiture in accordance with 18 U.S.C. § 982(a)(1) and Rule 32.2 of the Federal Rules of Criminal Procedure.

A TRUE BILL

s/Foreperson	
FOREPERSON	_ = =1

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